Simon v. Adzilla, Inc [New Media] et al
Doc. 158 Att. 9

EXHIBIT J

Dockets.Justia.com

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

THEFACEBOOK, INC., Plaintiff, v. CONNECTU LLC, Defendant.	No. 06-2-39146-2 SEA SUBPOENA DUCES TECUM FOR DOCUMENTS AND VIDEOTAPE DEPOSITION SUPERIOR COURT OF THE STATE OF CALIFORNIA COUNTY OF SANTA CLARA Case No. 1 05 CV 047381

STATE OF WASHINGTON TO:

Pacific Northwest Software, Inc.
2210 - 177th Place NE
Redmond, WA 98052

PLEASE TAKE NOTICE that pursuant to Civil Rule 45 and Civil Rule 30(b)(6) you are commanded to appear, at the request of Plaintiff in the above captioned case, pending in Santa Clara County, California for a deposition at the offices of Orrick, Herrington & Sutcliffe, LLP, 719 Second Avenue, Suite 900, Seattle, Washington 98104, on Tuesday, January 23, 2007, commencing at 9:00 a.m. then and there to produce for oral examination one or more officers, directors or managing agents, or other persons who consent to testify on

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BAUMGARDNER & PREECE LLP
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Tel (206) 625-8600
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your behalf regarding the topics identified in Exhibit A, attached hereto, which are material to the establishment of the Plaintiff's case in the above-captioned cause of action, said deposition to be subject to continuance or adjournment from time to time or place to place until completed. This oral examination will be recorded on videotape. YOU ARE FURTHER COMMANDED to produce by January 15, 2007, to the undersigned counsel the documents identified in Exhibit B attached hereto.

HEREIN FAIL NOT AT YOUR PERIL

DATED this DEC 2 8 2006 day of December, 2006.

COM. CARLOS VELATEGUI

BARBARA MINER
Clerk of the Superior Court of King County, Washington

By: ____________________
Deputy Clerk
TANJALA LAMBETH

Attorney Requesting Subpoena:

CORR CRONIN MICHELSON
BAUMGARDNER & PREECE LLP

Laurie Thornton
Laurie Mae Thornton, WSBA 35030
Attorney for Plaintiff

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EXHIBIT A

1. All communications and interactions with Howard Winklevoss, Tyler Winklevoss, Cameron Winklevoss, Divya Narendra, ConnectU and i2Hub.

2. Work performed for ConnectU.

3. Any work done to acquire information from the Facebook website on behalf of ConnectU.

4. The creation, development, function and operation of software necessary to function as:

   - Social Butterfly
   - Facebook importer
   - a method to collect information form or import social networking profiles

5. Remuneration from ConnectU.

6. Use of information obtained from Facebook by Pacific Northwest Software, Connect U or i2Hub.

7. Solicitation of Facebook members by ConnectU.

8. Authentication of documents produced.

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EXHIBIT B

1. All documents related to Facebook importer, social butterfly, or any other means of importing social networking profiles.

2. All documents related to "Jenn Starr," god@harvard.edu, jstarr@georgetown.edu, jstarr@amherst.edu, jstarr@dartmouth.edu.

3. All documents related to iMarc.

4. All documents related to i2Hub.

5. All documents reflecting communications with iMarc, including any emails sent or received from the imarc.com domain (*i.e.*, _______@imarc.com).

6. All documents reflecting communications with i2Hub, including any emails sent or received from the i2hub,com domain (*i.e.*, _______@i2hub.com).

7. All documents related to any attempt to access Facebook (also known as TheFacebook, thefacebook.com, and facebook.com).

8. Full source code copies of any software used in attempts to access Facebook, collect information on Facebook, or import profiles from Facebook (Facebook also is known as TheFacebook, thefacebook.com, and facebook.com).

9. All documents related to ConnectUcom, ConnectU, Connect U, HarvardConnection.com, HarvardConnection, or Harvard Connection, including emails sent to or from the connectu.com and HarvardConnection.com domains (*i.e.*, _____@connectu.com and _____@harvardconnection.com).

10. All documents related to Cameron Winklevoss, Tyler Winklevoss, Howard Winklevoss, or Divya Narendra, winklev@fas.harvard.edu; Cameron@winklevoss.com, twinklev@fas.harvard.edu, tyler@winklevoss.com, hwinklevoss@winklevoss.com, narendra@fas.harvard.edu, dknyc82@yahoo.com.

11. All bills sent to ConnectU, LLC and any record of payments made by ConnectU, LLC.

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